

U.S. DISTRICT COURT
DISTRICT OF VERMONT
FILED

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

2023 AUG -3 PM 3:32

CLERK

UNITED STATES OF AMERICA

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v.

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Case No.

VINCENZO ROOSA,
Defendant.

)
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)

2:23-cr-83-1

INDICTMENT

The Grand Jury charges:

Count One

On or about June 10, 2023, in the District of Vermont, defendant VINCENZO ROOSA, knowing and in reckless disregard of the fact that certain aliens—including E.M.G.—had come to, entered, and remained in the United States in violation of law, transported and moved and attempted to transport and move E.M.G. within the United States in furtherance of her violation of law.

(8 U.S.C. § 1324(a)(1)(A)(ii))

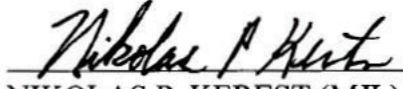
Forfeiture Notice

1. The allegations contained in Count One of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture bases.
2. Pursuant to 18 U.S.C. § 982, upon conviction of the offense alleged in Count One, the defendant, VINCENZO ROOSA, shall forfeit to the United States the 2017 Chevrolet Traverse bearing VIN 1GNKVGKDXHJ147362 as a vehicle used in the commission of a violation of 8 U.S.C. § 1324(a) (Section 274(a) of the Immigration and Nationality Act). The defendant shall also forfeit the Heckler & Koch VP9 9-millimeter pistol bearing serial number 224-315993, the pistol's magazine, the pistol's Vortex Viper red dot sight, and the rounds of 9-millimeter ammunition as personal property used to facilitate the commission of that offense.
3. If any described forfeitable property, as a result of any act or omission of the defendant,
 - (1) cannot be located upon the exercise of due diligence;
 - (2) has been transferred or sold to, or deposited with, a third party;
 - (3) has been placed beyond the jurisdiction of the court;
 - (4) has been substantially diminished in value; or
 - (5) has been commingled with other property which cannot be subdivided without difficulty,the United States shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p) and 18 U.S.C. § 982(b).

TRUE BILL

REDACTED

FOREPERSON



NIKOLAS P. KEREST (MJL)
United States Attorney
Burlington, Vermont
August 3, 2023